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30           **UNITED STATES DISTRICT COURT**  
 31           **NORTHERN DISTRICT OF CALIFORNIA**

32          ANIBAL RODRIGUEZ, SAL CATALDO,  
 33          JULIAN SANTIAGO, and SUSAN LYNN  
 34          HARVEY individually and on behalf of all  
 35          other similarly situated,

36           Plaintiffs,

37          vs.

38          GOOGLE LLC,

39           Defendant.

40          Case No.: 3:20-cv-04688-RS

41           **DECLARATION OF RYAN SILA IN  
 42           SUPPORT OF PLAINTIFFS'  
 43           ADMINISTRATIVE MOTION TO SEAL  
 44           EXHIBITS IN OPPOSITION TO  
 45           GOOGLE'S MOTION TO STRIKE**

46          Judge: Hon. Richard Seeborg  
 47          Courtroom 3 – 17th Floor  
 48          Date: February 13, 2025  
 49          Time: 1:30 p.m.

**DECLARATION OF RYAN SILA**

I, Ryan Sila, declare as follows.

1. I am an associate with the law firm of Susman Godfrey L.L.P., counsel for Plaintiffs in this matter. I am an attorney at law duly licensed to practice before all courts of the State of New York and admitted *pro hac vice* for this case. Dkt. 232. I have personal knowledge of the matters set forth herein and am competent to testify.

2. Pursuant to Civil Local Rule 79-5, I submit this Declaration in support of Plaintiffs' administrative motion to seal portions of the exhibits attached to Plaintiffs' opposition to Google's motion to strike. In making this request, Plaintiffs have carefully considered the relevant legal standard and policy considerations outlined in Civil Local Rule 79-5.

3. Plaintiffs respectfully request that the Court seal portions of Exhibit 2, Exhibit 3, and Exhibit 9, which are attached to the declaration of Mark Mao in opposition to Google's Motion to Strike.

4. The information requested to be sealed is being designated by Plaintiffs as “Confidential” pursuant to the parties’ Stipulated Protective Order (Dkt. 70).

5. Specifically, the portions at issue reveal the Plaintiffs' home addresses and phone numbers. If the Court were to deny sealing this information, Plaintiffs could be subjected to a heightened risk of injury, including identity theft.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed this 16th day of January, 2025, at Hoboken, New Jersey.

/s/ Ryan Sila